

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ABINGDON**

**UNITED STATES OF AMERICA**

**v.**

**INDIVIOR INC. (a/k/a Reckitt Benckiser  
Pharmaceuticals Inc.) and  
INDIVIOR PLC**

**Case No. 1:19-CR-00016**

**MOTION TO SEAL EXHIBITS**

The United States of America (“United States”) hereby moves for an order sealing all exhibits to its Response in Opposition to Motion to Dismiss the Indictment (submitted to the Court yesterday) (“Response”) except Exhibit 4, for the following reasons. Exhibit 1 is a transcript of grand jury proceedings. Exhibits 2-3 are excerpts from statements defense counsel made in pre-indictment discussions with the United States. Exhibits 5-6 are sealed court filings of the defendants. Exhibits 7-17 are transcripts of grand jury proceedings. Finally, Exhibit 18 is an email chain between attorneys for a witness who testified before the grand jury and the United States, discussing the witness’s grand jury testimony. Defense counsel may wish to have its statements in discussions with the United States (Exhibits 2-3) and sealed court filings (Exhibits 5-6) kept confidential, and the witnesses’ grand jury testimony (Exhibits 1, 7-17) and email discussing such testimony (Exhibit 18) should be kept confidential. Accordingly, the United States asks that these exhibits to the Response be filed under seal. If this Motion to Seal Exhibits is granted, the United States will file Exhibit 4 (a publicly available brief previously filed in the United States Court of Appeals for the Sixth Circuit), together with a redacted version of the Response, on the public docket.

Respectfully submitted,

DANIEL P. BUBAR

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Attorney for the United States, Acting Under  
Authority Conferred by 28 U.S.C. § 515

/s/ Albert P. Mayer, VSB No. 86024

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**CERTIFICATE OF SERVICE**

I certify that on August 21, 2019, I electronically filed the foregoing Motion to Seal Exhibits with the Clerk of Court via the CM/ECF system, which will send notification of the filing to all counsel of record in this matter.

/s/ Albert P. Mayer, VSB No. 86024